

Judge Wiles
Chapter 11
Case No. 22-10943 (MEW) (Jointly Administered)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: VOYAGER DIGITAL HOLDINGS, INC. et al.,¹

Debtors.

MOTION FOR OBJECTION TO CLAIM AMOUNT

Honorable Judge Wiles,

I am having a problem and object to my claim amount. I sent in an objection to my claim prior to the October deadline they proposed to us but have yet to see any changes on my account. If you look at the pictures I have attached below and clearly see that my average daily balances for certain crypto was not accurate and the rewards continued to decrease over time.

For example, if you look on November 9, 6:24 PM; you will see a deposit of 3512.5 ADA. My first reward on December 1 at 4:55 PM shows my average daily balance is 2341.6 ADA. This is not true at all and the 4.50% rewards I was supposed to receive is not calculated right based of the numbers in the Voyager App.

Another example would be my Ethereum. I deposited 4.03768 ETH at 7:23 PM ON 11/09/2021. My first reward at 4.60%, states my average daily balance was 2.69179 ETH. Again, this is wrong and affects the reward amount I am to receive.

Another example from the beginning of my dealings with Voyager and its corrupt business antics, is my Bitcoin deposited on the 9th of November of 2021 at 7:37. I deposited 0.281018 BTC and when it comes to my first reward with the company on December 1, it shows a 5.75% annual % for an average daily balance of 0.187345 BTC. Again, your honor, false and not true. I have been getting robbed of my crypto and rewards since the beginning of my journey with Voyager Digital Holdings INC. et., al.,1.

Another prime example would be my Uniswap your honor. I deposited on the 9th 43.153 UNI. My first reward on December 1st shows an annual % of 2.00 and my average daily balance of 28.769 UNI. Again, not reflecting accurately at what my portfolio was at and again showing that I was being skimmed of my rewards and crypto. If you look at each picture you honor and check my average daily balance and the rewards; you will see that my rewards get smaller and smaller and my average daily balances for these crypto is not accurate. So, my claim amounts your honor with all due respect is not accurate whatsoever and I would like a full audit of my account for the sake of my claim. As of now the claim they have for me in the app is not accurate, because it is not based on true and accurate calculations of my percentage rates and the daily balances of the crypto, I held.

Furthermore, we can see that on February 1, 2021, at 4:18 PM; my annual percentage after just one month has changed from 5.75% to 4.75%. in addition, my average daily balance again is wrong, 0.2859 BTC. Now, when we go to March your honor for BTC, average daily balance shows as 0.287035. right away your honor, showing that my rewards went down after the first month of my rewards. It didn't state that the annual percentage rates would change daily or fluctuate when I read through the rewards program.

Moreover, let's look at April 1, at 6:58 AM. I was awarded 0.000973 BTC. It again shows a different average balance than it should, the annual percentage for rewards dropped to 4.05%, the average daily balance is wrong, and I received a lower amount award than I did for the previous month. This is no way makes sense your honor. On May 1, at 11:18 I received an award of 0.000735 BTC, again wrong average daily balance, and a lower award amount than the previous months and again your honor the annual percentage rate drops to 3.05%. may same issue your honor. In June, the annual % was 3.08% average daily balance was 0.289895 and my reward was 0.000744 BTC. July, annual percentage rate is 3.04%, average daily balance is 0.290638 BTC and I was awarded 0.000736.

As you can see these inaccuracies and fluctuation of my crypto daily balance and rewards has thrown my portfolio off, hence, my claim amount is wrong, and I would like my account to be adjusted accurately and my claim amount to be adjusted to reflect the right amount.

Let's look at my ETH. First reward was on December first which shows a daily balance of 2.69179 ETH, annual percentage rate of 4.60% and an award of 0.01032 ETH. Looking from January to February rewards, one can see that the annual % rate is 4.25%, my average daily balance shows as 4.06301 ETH, and I was awarded 0.01439 ETH. Keep in mind now that the month before the reward was 0.01552 ETH with a wrong daily balance. Looking on 04/01/2022, we can see that the average daily balance was 4.09187 ETH and I was awarded 0.01449 ETH. Now looking on the next month 05/01/2022. We can see that the annual percentage rate dropped to 3.75% my average daily balance (still wrong) at 4.10635 ETH, and my reward amount 0.01283 ETH. So, from 04/01/2022 my reward went from 0.01449 ETH to 0.01283 ETH on 05/01/2022. jumping to June 1, we can see that the annual percentage rate went back up to 4.50%, but just last month it was 3.75%. now to conclude with July, the annual percentage rate

was 4.05% my reward, which went down again was 0.01395 and my average daily balance was 4.1346 ETH.

Now let's look at the ADA transactions. 12/01/2021 my average daily balance which again is not right, was 2341.6 ADA. Annual percentage rate 4.50% awarded 8.8 ADA. Keep in mind your honor, the deposit of my ADA from another exchange was 3512.5. none the less, if you look at the months ahead you will see the same thing and the lower and lower rewards and the wrong reporting of my average daily balance.

Concluding, I would like my account to be fully reassessed and my claim amount to reflect the true and accurate balance as it should be.

8:43

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ADA Received Details

Type

Crypto Received

Source

Blockchain

Amount

3512.5 ADA

Cleared On

Nov 9, 06:24 PM

Status

Complete

Confirmation

To

Voyager

From

addr1vypr00ss7hkqejmvh53xkyf0p9q0a4z2uprxmx6njc463vgst3pe4

Voyager ID

01FM3KQBCBEQGSBT888ZWR1S3W

Transaction Hash

33c6686e2eb7371a9cffd1146baf9298080a8eac0ed62cb12ed76b231283296b

8:43

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ETH Received Details

Type	Source
Crypto Received	Blockchain

Amount	Cleared On
4.03768 ETH	Nov 9, 07:23 PM

Status	Confirmation
Complete	

To

Voyager

From

0x3cD751E6b0078Be393132286c442345e5DC49699

Voyager ID

01FM3Q2FH6JE3YR41SHMVY1EZQ

Transaction Hash

0x709e3f4f2d34b6651a8893e6fde320af8ced7b5167a943fb9aabf7e6aedd2944

8:44

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UNI Received Details

Type	Source
Crypto Received	Blockchain

Amount	Cleared On
43.153 UNI	Nov 9, 07:23 PM

Status	Confirmation
Complete	

To

Voyager

From

0xb739D0895772DBB71A89A3754A160269068f0D45

Voyager ID

01FM3Q2G0HXMVQ93PBM9HKGR48

Transaction Hash

0x885e60462cf96493a3efd7f612ffe601ee9b41148c73cb4a15ea33deb2d3c8ef

8:44

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BTC Received Details

Type	Source
Crypto Received	Blockchain

Amount	Cleared On
0.281018 BTC	Nov 9, 07:37 PM

Status	Confirmation
Complete	

To

Voyager

From

3CKraoCph1KS611G7xT7y1kTdPPNg9FwD

Voyager ID

01FM3QNVFPRV4SX7R5DS7EDDZF

Transaction Hash

bc8d124af09164082f64947ff81d7fc038f12abe2e660c1bf4eb0f7ba8abacaa

8:44

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UNI Reward Details

Type	Source
Reward	Reward
Amount	Cleared On
0.048 UNI	Dec 1, 06:50 AM
Status	
Complete	
Annual %	Avg. Daily Balance
2.00%	28.769 UNI
Note	
Rewards payment for November 2021	Learn More
Transaction ID	
01FNV0QCBW75VAQDSZ8X21NJR	

8:55

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10:18

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BTC Reward Details

Type

Reward

Source

Reward

Amount

0.001360 BTC

Cleared On

Jan 1, 03:27 AM

Status

Complete

Annual %

5.75%

Avg. Daily Balance

0.283823 BTC

Note

Rewards payment for December 2021

Learn More

Transaction ID

01FRAFDPA99HT8XJRR3CA5BYAN

10:18

55

<ETH Reward Details

Type

Reward

Source

Reward

Amount

0.01552 ETH

Cleared On

Jan 1, 04:38 AM

Status

Complete

Annual %

4.60%

Avg. Daily Balance

4.04766 ETH

Note

Rewards payment for December 2021

Learn More

Transaction ID

01FRAKG02YS78RVW8KNHWCE7SQ

10:19

Respectfully submitted,

/s/ Alah Shehadeh

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